

ORIGINAL

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

- - - - - X

UNITED STATES OF AMERICA

- v. -

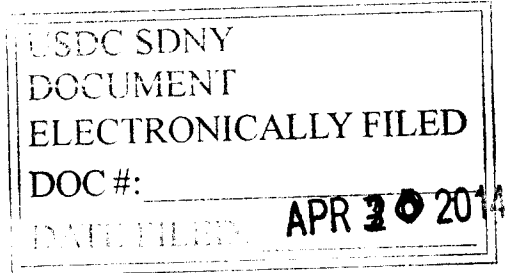
FNU LNU,  
a/k/a "Daniel,"

Defendant.

- - - - - X

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:  
: INDICTMENT

: 14 Cr. **CRIM 280**  
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:  
:



COUNT ONE

The Grand Jury charges:

1. From at least in or about January 2014, up to and including in or about February 2014, in the Southern District of New York and elsewhere, FNU LNU, a/k/a "Daniel," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that FNU LNU, a/k/a "Daniel," the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substance that FNU LNU, a/k/a "Daniel," the defendant, conspired to distribute and possess with the intent to distribute was one kilogram and more of mixtures and substances containing a detectable amount of

JUDGE ENGELMAYER

heroin, in violation of Title 21, United States Code, Section 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

FORFEITURE ALLEGATION

4. As a result of committing the controlled substance offense charged in Count One of this Indictment, FNU LNU, a/k/a "Daniel," the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting or derived from any proceeds the defendant obtained directly or indirectly as a result of the offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offense charged in Count One of this Indictment.

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of FNU LNU, a/k/a "Daniel," the defendant:

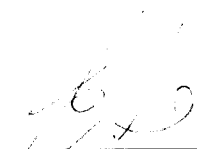
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value;


or

- e. has been commingled with other property  
which cannot be subdivided without  
difficulty,

it is the intent of the United States, pursuant to Title 21,  
United States Code, Section 853(p), to seek forfeiture of any  
other property of the defendant up to the value of the above  
forfeitable property.

(Title 21, United States Code, Section 853.)

  
FOREPERSON

  
PREET BHARARA  
United States Attorney

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

FNU LNU,  
a/k/a "Daniel,"

Defendant.

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INDICTMENT

(21 U.S.C. § 846.)

PREET BHARARA

United States Attorney.

A TRUE BILL

  
Foreperson.

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4/30/14  
P

All Ind Part 14-1-87 The case  
is assigned to Judge Engel/nyss for  
All purposes A/W order  
The Judge/nyss